



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#:  
DATE FILED: 7/16/2020

Jessica Friedrich  
Joanna C. Kahan

Of counsel  
Diane Ferrone

July 15, 2020

**Via ECF**

Honorable Andrew L. Carter Jr.  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

MEMO ENDORSED

Re: *Lopez et al., v. Lucero Produce II Corp. et al.*,  
19 Civ. 11619 (ALC)

Dear Judge Carter:

We represent the defendants in the above-captioned action and write with the consent of plaintiffs' counsel. On June 30, 2020, the parties reached a settlement in principle through a mediation session. On July 6, 2020, the undersigned wrote to Magistrate Judge Netburn to inform the Court that the initial conference scheduled for July 14, 2020 was no longer necessary. Magistrate Judge Netburn set a deadline of July 20, 2020 for the parties to submit an executed settlement agreement accompanied by supporting documents in line with *Cheeks*. While the parties remain confident that the settlement agreement is forthcoming, they need additional time for final editing, review (and for the plaintiffs such review will require translation) and execution of the relevant documents. We respectfully request an extension of two weeks from July 20, 2020 or by August 3, 2020 in which to submit the executed settlement and supporting *Cheeks* documents for the Court's review.

We thank the Court in advance for its consideration of these matters.

Respectfully submitted,

/s/

Cardi & Edgar

SO ORDERED:

HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

July 16, 2020